

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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|--|---|--------------------------------------|
| In the Matter of |) | |
| |) | |
| Performance Measurements and Standards |) | CC Docket No. 01-321 |
| For Interstate Special Access Services |) | |
| |) | |
| Petition of US West, Inc., for a Declaratory |) | |
| Ruling Preempting State Commission |) | CC Docket No. 00-51 |
| Proceedings to Regulate US West's |) | |
| Provision of Federally Tariffed Interstate |) | |
| Services |) | |
| |) | |
| Petition of Association for Local Tele- |) | |
| Communications Services for Declaratory |) | CC Docket Nos. 98-147, 96-98, 98-141 |
| Ruling |) | |
| |) | |
| Implementation of the Non-Accounting |) | |
| Safeguards of Sections 271 and 272 of the |) | CC Docket No. 96-149 |
| Communications Act of 1934, as amended |) | |
| |) | |
| 2000 Biennial Regulatory Review- |) | |
| Telecommunications Service Quality |) | CC Docket No. 00-229 |
| Reporting Requirements |) | |
| |) | |
| AT&T Corp. Petition to Establish |) | |
| Performance Standards, Reporting |) | RM 10329 |
| Requirements, and Self-Executing Remedies) |) | |
| Need to Ensure Compliance by ILECs with |) | |
| Their Statutory Obligations Regarding |) | |
| Special Access Services |) | |

MOTION TO ACCEPT PLEADING AS TIMELY FILED

BellSouth Corporation, on behalf of itself and its wholly owned subsidiaries ("BellSouth"), hereby requests that, for good cause shown, the Commission accept its Reply Comments in the above-captioned proceeding as timely filed.

BellSouth was prevented from filing its Reply Comments electronically on February 12, 2002, due to unavailability of the Commission's Electronic Comment Filing System ("ECFS").

Upon contacting the ECFS helpline by telephone on the evening of February 12, BellSouth was advised by a recorded message that the ECFS would be unavailable until noon today, February 13, 2002, due to unscheduled maintenance on the Commission's servers. BellSouth subsequently filed its Reply Comments via the ECFS today.

Accordingly, because BellSouth was prevented from electronically filing its Reply Comments prior to the filing deadline because of the unavailability of the ECFS, BellSouth requests that the Commission accept its Reply Comments, filed today, February 13, 2002, as timely filed.

Respectfully submitted,

BELLSOUTH CORPORATION

By: /s/ Richard M. Sbaratta
Richard M. Sbaratta

Its Attorney

Suite 4300
675 West Peachtree Street, N. E.
Atlanta, Georgia 30375-0001
(404) 335-0738

Date: February 13, 2002

CERTIFICATE OF SERVICE

I do hereby certify that I have this 13th day of February 2002 served the following parties to this action with a copy of the foregoing **MOTION TO ACCEPT PLEADING AS TIMELY FILED** by electronic filing and/or by placing a copy of the same in the United States Mail, addressed to the parties listed on the attached service list.

/s/ Juanita H. Lee
Juanita H. Lee

Service List CC Docket Nos. 01-321, 00-51, 98-147, 06-98, 08-141, 95-149 and 00-229

Lawrence G. Malone
Brian P. Ossias
Public Service Commission of
The State of New York
Three Empire State Plaza
Albany, New York 12223-1350

Jonathan Askin
Teresa K. Gaugler
Association for Local
Telecommunications Services
888 17th Street, NW
Washington, DC 20005

Wayne V. Black
C. Douglas Jarrett
The American Petroleum
Institute
1001 G Street, N. W.
Suite 500 West
Washington, D. C. 20001

Charles C. Hunter
Catherine M. Hannan
Association of Communications
Law Group
Hunter Communications Law Group
Suite 105
1424 Sixteenth Street, N. W.
Washington, D. C. 20036

James L. Casserly, Sara F. Leibman
Robin E. Tuttle, Angela F. Collins
AT&T Corporation
Mintz, Levin, Cohn, Ferris,
Glovsky and Popeo, P. C.
Suite 900
701 Pennsylvania Ave., N. W.
Washington, DC 20004

Mark C. Rosenblum, Lawrence J. Lafaro
Richard H. Rubin, James W. Grudus
Deborah S. Waldbaum
AT&T Corporation
Room 1134L2
295 North Maple Avenue
Basking Ridge, NJ 07920

Howard J. Symons, Michael Pryor,
Russ Taylor, Christopher R. Bjornson,
AT&T Wireless Services, Inc.
Mintz, Levin, Cohn, Ferris, Glovsky
And Popeo
Suite 900
701 Pennsylvania Avenue, N.W.
Washington, D. C. 20004

Douglas I. Brandon
AT&T Wireless Services, Inc.
1150 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036

Audrey Wright
Cable & Wireless USA, Inc.
Director, Domestic Regulatory Affairs
1130 Connecticut Avenue, N. W.
Suite 1201
Washington, D. C. 20036

Steven A. Augustino
Ronald J. Jarvis
Cable & Wireless USA, Inc.
Kelley Drye & Warren, LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

Cherie R. Kiser
Lisa N. Anderson
Cablevision LightPath, Inc.
Mintz Levin Cohn Ferris
Glovsky and Popeo, PC
701 Pennsylvania Avenue, N.W.
Washington, D. C. 20004

Carol Ann Bischoff
Jonathan D. Lee
Competitive Telecommunications
Association
Suite 800
1900 M Street, N.E.
Washington, D. C. 20036

Robert J. Aamoth
Competitive Telecommunications
Association
Kelly Drye & Warren LLP
Suite 500
1200 19th Street, N. W.
Washington, D.C. 20036

Patrick J. Donovan
Paul B. Hudson
DIRECTV Broadband, Inc.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N. W.
Suite 300
Washington, D. C. 20007

Gregg C. Sayre
Frontier and Citizens Incumbent
Local Exchange Carriers
180 South Clinton Avenue
Rochester, New York 14646

Anna Sokolin-Maimon, Esq.
Metropolitan Telecommunications
44 Wall Street, 14th Floor
New York, NY 10005

Russell I. Zuckerman
Francis D. R. Coleman,
Richard E. Heatter
Marilyn H. Ash
Mpower Communications Corp.
175 Sully's Trail, Suite 300
Pittsford, NY 14534

Richard A. Askoff
National Exchange Carrier
Association, Inc.
80 South Jefferson Road
Whippany, New Jersey 07981

Margot Smiley Humphrey
National Exchange Carrier
Association, Inc.
Suite 100
2099 Pennsylvania Avenue
Washington, D. C. 20006

Stuart Polikoff
Organization for The Promotion and
Advancement of Small
Telecommunications Companies
21 Dupont Circle, NW
Suite 700
Washington, D. C. 200036

L. Marie Guillory
Daniel Mitchell
National Telephone Cooperative
Association
4121 Wilson Boulevard
10th Floor
Arlington, VA 22203

Eric J. Branfman
Harry N. Malone
Paetec Communications, Inc.
Swidler Berlin Shereff Friedman, LLP
300 K Street, N. W., Suite 300
Washington, D. C. 20007

Robert B. McKenna
Sharon J. Devine
Qwest Communications
International, Inc.
Suite 700
1020 19th Street, N. E.
Washington, DC 20036

Benjamin H. Dickens, Jr.
Gerald J. Duffy
Douglas W. Everette
Rural ILEC Coalition
Blooston, Mordkofsky, Dickens,
Duffy & Prendergast
2120 L Street, NE, Suite 300
Washington, D.C. 20037

Christopher M. Heimann
Gary L. Phillips
Paul K. Mancini
SBC Communications Inc.
1401 Eye Street, N.W., Suite 400
Washington, D.C. 20005

Susan J. Bahr
Small Independent Telephone Companies
Law Offices of Susan Bahr, PC
P. O. Box 86089
Montgomery Village, MD 20886-6089

Max Yzaguirre
Brett A. Perlman
Rebecca Klein
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78711-3326

Thomas Jones, Christi Shewman
Kelly N. McCollan
Time Warner Telecom and
XO Communications, Inc.
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N. E.
Washington, D. C. 20036

Lawrence E. Sarjeant
United States Telecom Association
1401 H Street, NW, Suite 600
Washington, DC 20005

Brian T. O'Connor
Robert A. Calaff
Harold Salters
VoiceStream Wireless Corporation
401 9th Street, NW, Suite 550
Washington, D. C. 20004

Douglas G. Bonner
Elizabeth Dickerson
VoiceStream Wireless Corporation
LeBoeuf, Lamb, Greene &
MacRae, L.L.P.
1875 Connecticut Avenue, NE
Washington, DC 20009

Lisa B. Smith
Lisa R. Youngers
WorldCom, Inc.
1133 19th Street, NW
Washington, DC 20036

Ruth Milkman
Gil M. Strobel
WorldCom, Inc.
Lawler, Metzger & Milkman
1909 K Street, NW
Suite 820
Washington, DC 20006

Richard Metzger, Jr.
The Joint Competitive Industry Group
Lawler, Metzger & Milkman, LLC
1909 K Street, NE
Suite 820
Washington, D. C. 20006

+Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room TW-B204
Washington, D.C. 20554

+Qualex International
The Portals, 445 Twelfth Street, S. E.
Room CY-B02
Washington, D.C. 20554

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